

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CHARLOTTE FREEMAN, et al.,

Plaintiffs,

-against-

HSBC HOLDINGS PLC, et al.,

Defendants.

14-CV-6601 (DLI/CLP)

NOTICE OF DEFENDANTS' MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the Complaint (annexed hereto), Defendants' Joint Memorandum in Support of Motion to Dismiss, Memorandum of Law of Defendants HSBC Holdings PLC, HSBC Bank PLC, HSBC Bank Middle East Limited, HSBC Bank USA, N.A., and The Royal Bank of Scotland N.V. in Support of Motion to Dismiss and Memorandum of Law of Defendant Credit Suisse AG in Support of Motion to Dismiss; and all prior pleadings and proceedings herein, Defendants HSBC Holdings PLC, HSBC Bank PLC, HSBC Bank Middle East Limited, HSBC Bank USA, N.A., Barclays Bank PLC, Standard Chartered Bank, The Royal Bank of Scotland N.V. and Credit Suisse AG hereby move this Court, before the Honorable Dora L. Irizarry, at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, 11201, for an order pursuant to Rule 12(b) of the Federal Rules of Civil Procedure dismissing this action.

March 16, 2015

Respectfully submitted,

MAYER BROWN LLP,

by

/s/ Mark G. Hanchet

Mark G. Hanchet
1221 Avenue of the Americas
New York, NY 10020-1001
(212) 506-2500
mhanchet@mayerbrown.com

Andrew J. Pincus
Paul W. Hughes
1999 K Street, N.W.
Washington, CC 20006-1101
(202) 263-3000
apincus@mayerbrown.com
phughes@mayerbrown.com

CLIFFORD CHANCE US LLP,

by

/s/ Steven T. Cottreau

Steven T. Cottreau
2001 K Street NW
Washington, DC 20006-1001
(202) 912-5000
steve.cottreau@cliffordchance.com

Robert G. Houck
Jamie L. Hoxie
31 West 52nd Street
New York, NY 10019-6131
(212) 878-8000
robert.houck@cliffordchance.com
jamie.hoxie@cliffordchance.com

Attorneys for Defendant HSBC Holdings PLC, HSBC Bank PLC, HSBC Bank Middle East Limited and HSBC Bank USA, N.A.

Attorneys for Defendant The Royal Bank of Scotland N.V.

SULLIVAN & CROMWELL LLP,

by

/s/ Michael T. Tomaino, Jr.

Michael T. Tomaino, Jr.
Jeffrey T. Scott
Jonathan M. Sedlak
125 Broad Street
New York, NY 10004
(212) 558-4000
tomainom@sullcrom.com
scottj@sullcrom.com
sedlakj@sullcrom.com

*Attorneys for Defendant Barclays
Bank PLC*

CRAVATH, SWAINE & MOORE LLP,

by

/s/ Richard W. Clary

Richard W. Clary
Michael T. Reynolds
John D. Buretta
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
(212) 474-1000
rclary@cravath.com
mreynolds@cravath.com
jburetta@cravath.com

*Attorneys for Defendant Credit Suisse
AG*

SULLIVAN & CROMWELL LLP,

by

/s/ Sharon L. Nelles

Sharon L. Nelles
Bradley P. Smith
125 Broad Street
New York, NY 10004
(212) 558-4000
nelless@sullcrom.com
smithbr@sullcrom.com

*Attorneys for Defendant Standard
Chartered Bank*

TO:

Aaron Schlanger, Esq.
Ari Ungar, Esq.
Gary M. Osen, Esq.
Naomi B. Weinberg, Esq.
Joshua D. Glatter, Esq.
Osen LLC
2 University Plaza, Suite 201
Hackensack, NJ 07601
(201) 265-6400

Peter Raven-Hansen, Esq.
Osen LLC
700 Kinderkamack Road
Oradell, NJ 07649
(201) 265-0303

Clyde T. Turner, Esq.
Turner and Associates
4705 Somers Avenue, Suite 100
North Little Rock, AR 72116
(501) 791-1251

Counsel for Plaintiffs

VIA ECF